

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE
OF RESPONSES OF WITNESS CAMPBELL TO INTERROGATORIES OF
KEYSPAN ENERGY

The United States Postal Service hereby moves that it be permitted to file one workday (three calendar days) late the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T29-23(a)-(i), filed on February 25, 2000.

The responses were due to have been filed on Friday, March 10, 2000. Preparation of the responses required extensive consultation with numerous field mail processing facilities and a visit to one out-of-town facility, which were not completed until the morning that the responses were due. Consequently, preparation of written responses could not be completed in time for filing that day. To minimize, if not eliminate any prejudice to the requesting party caused by a delay in responding, the Postal Service informally transmitted a partial response to these interrogatories on the due date. Accordingly, the Postal Service considers that there will be no prejudice to any party as a result of the formal filing of complete responses one working day (three calendar days) late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
March 13, 2000